



Association for Professionals in
Infection Control & Epidemiology, Inc.

March 4, 2009

Representative Bert Johnson - Chair
P.O. Box 30014
Lansing, MI 48909-7514

The Honorable Representative Bert Johnson:

I am writing on behalf of the Association for Professionals in Infection Control and Epidemiology, Inc.- Greater Detroit concerning the revision of the Michigan Medical Waste Act (MMWA).

APIC Greater Detroit (APIC-GD) Chapter 077 is an official chapter of the Washington DC based Association for Professionals in Infection Control and Epidemiology, Inc. (APIC), with 120 active members throughout the state of Michigan. APIC's mission is to improve health and patient safety by reducing risks of infection and other adverse outcomes. APIC's more than 11,000 members have primary responsibility for infection prevention, control and hospital epidemiology in health care settings around the globe, APIC advances its mission through education, research, collaboration, public policy, practice guidance

APIC-GD supports the current revision of the MMWA Act, entitled as *HB4459*. APIC-GD participated in the legislative process of developing the original MMWA from the beginning, supporting the existing rule and regulation, as well as the current proposed rule revision in *HB 4459*. We have assisted the Medical Waste Office, collaborating with the Michigan Society for Infection Prevention and Control, in providing education and health promotion to our members and communities, related to minimizing exposure from regulated medical waste (RMW). We find the current proposed rule in *HB4459* maintains Michigan's requirements on a solid foundation of science as is evident in the care taken with the proposed MMWA definitions. MDEQ staff have fostered a dialogue with all stakeholders during this review process and clearly sought to ensure a thorough hearing of all views in order to reach consensus.

APIC-GD supports only the current Bill HB 4459 which reflects this consensus and clearly promotes minimization of risk related to disposal of all categories of RMW and home-generated waste. Although we see the definition of "trauma waste" as duplicative, we can only support the language that provides for a trauma management plan as stated in *HB 4459*.

APIC-GD opposes and does not support *HB 4458* and cannot support the current tie-bar to *HB 4459* since *HB 4458* does not include many of the other definition revisions/provisions critical to the intent of the rule reached by all stakeholders over a long period of study and review of evidence. The additional language contained in *HB 4458* was considered and rejected by the Medical Waste Advisory Committee stakeholders group and the tie-bar between the two bills is unacceptable. The question of the need to regulate trauma scene cleanup companies is an entirely separate issue independent from the revisions to the Medical Waste Act and should not be tied in any way to the provisions of the Medical Waste Act other than clearly identifying Trauma Scene Cleanup operators as a regulated producer of medical waste.

Unfortunately we are unable to testify during today's public hearing, but APIC-GD does consider this critical legislation. Please feel free to direct any questions to Ms. Judene Bartley, MS, MPH, CIC, APIC-GD's Advocacy Chair at jbartley@ameritech.net or call 248-646-4785.

Sincerely,

A handwritten signature in black ink that reads 'Lisa Sturm'.

Lisa Sturm, MPH, CIC

President, Association for Professionals in Infection Control and Epidemiology-Greater Detroit
www.apic-gd.org